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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

Thomas R. Keane & Susan D. Keane,

Plaintiffs,

v.

United State of America,

Defendant.

Case No. 3:13-cv-05712-MEJ

STIPULATION EXTENDING TIME TO  
ANSWER OR OTHERWISE RESPOND  
AND CONTINUING CASE  
MANAGEMENT CONFERENCE AND  
~~PROPOSED~~ ORDER

IT IS HEREBY STIPULATED by and between Defendant the United States of America (“United States”) and Plaintiffs Thomas R. Keane and Susan D. Keane (“Plaintiffs”), by and through undersigned counsel and pursuant to Fed. R. Civ. P. 16(b)(4) and Local Civil Rule 6-2, that good cause exists and the parties request that the Court continue both the date for the United States to answer or otherwise respond to Plaintiffs’ Complaint, and the Case Management Conference currently scheduled for April 24, 2014, by approximately 60 days, and state as follows in support:

Plaintiffs commenced the instant action on or about December 10, 2013. The parties are

currently working to resolve the case without the Court's involvement, and anticipate that a resolution will be reached that will result in dismissal of the Complaint.

Accordingly, the parties hereby stipulate that the United States shall have until May 23, 2014, to answer or otherwise respond to Plaintiffs' Complaint, and also that the Case Management Conference currently scheduled for April 24, 2014, be continued until June 26, 2014 at 10:00 am. The requested extension is not being made for purposes of delay, but to allow for the parties to continue settlement negotiations. The parties previously requested and received two extensions in this matter.

Respectfully submitted this 20th day of March, 2014,

MELINDA HAAG  
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Attorneys for the United States of America

Attorneys for Thomas R. Keane  
and Susan D. Keane

~~PROPOSED~~ ORDER

Upon stipulation of the parties, and for good cause shown, it is hereby ORDERED that the United States of America shall have until May 23, 2014, to answer or otherwise respond to Plaintiffs' Complaint.

1 It is further ORDERED that the Case Management Conference currently scheduled for  
2 April 24, 2014 is continued until June 26, 2014 at 10:00 am.

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4 SO ORDERED this 20<sup>th</sup> day of March, 2014.

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7 THE HONORABLE MARIA-ELENA JAMES  
8 UNITED STATES MAGISTRATE JUDGE  
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